

SHER TREMONTE LLP

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**FILED VIA ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

***Re: United States v. Joadin Espinal Rodriguez***  
Case No. 23 Cr. 494 (VEC)

Dear Judge Caproni:

We represent Joadin Espinal Rodriguez, a defendant in the above-referenced action. The defense respectfully requests permission for Ms. Gans, the appointed associate on the matter, to appear as lead counsel in the upcoming change of plea hearing scheduled for February 18, 2025, as Mr. Biale will be out of town. We have conferred with Mr. Espinal Rodriguez who has no objection to Ms. Gans appearing on his behalf for the hearing.

Respectfully submitted,

/s/ Noam Biale

Noam Biale  
Courtney Gans

cc: All counsel (by ECF)

Application GRANTED. Ms. Gans may appear as lead counsel at Defendant's change-of-plea hearing.

SO ORDERED.



2/14/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE